

February 26, 1997

**MEMORANDUM**

TO: District Directors  
Environmental Health Managers  
Division of Food and Environmental Services Staff

FROM: Gary L. Hagy, Director  
Division of Food and Environmental Services

SUBJECT: Hazard Analysis Critical Control Point (HACCP) Guidelines

Guidelines for Implementing a HACCP program are attached.

These guidelines were developed primarily by Jan LaPierre of the Henrico County Health Department after review of documents and guidelines from other states. Because of his efforts, these guidelines are available much earlier than if they were developed in this division. I thank him for his work. The format of the document is that which has been developed for all entries into the Division's Program Implementation Manual.

Please insert this document in your PIM manual and distribute copies to all persons in your district working in your foodservice protection program. Please note that the PIM is effective April 1, 1997. The forms associated with this PIM are not yet available but I hope to have them available before April 1.

If you have any questions, please contact me or any of the food consultants.

**Program:** Foodservice Protection

**Subject:** Hazard Analysis Critical Control Point (HACCP) Guidelines

**Objective:** The goal of statewide foodservice protection services is the prevention of foodborne illness. The development and implementation of a HACCP control plan is a valuable tool for empowering and motivating foodservice operators to recognize the hazards associated with their specific processes and ensure that those hazards are controlled.

**Authority:** The authority for issuing these HACCP guidelines is as follows:

**Code of Virginia**

1. §35.1-10 Measures to prevent transmission of disease;
2. §35.1-15 Training Materials;
3. §35.1-22 Periodic Inspections.

**Rules and Regulations of the Board of Health, Commonwealth of Virginia,  
Governing Restaurants**

1. §2.2 Purpose of Regulations (e.g., “Criteria for assuring the safe preparation, handling, protection, and/or temperature control for food;...”);
2. §2.19 Periodic Inspection;
3. §2.26 Measures to Prevent Transmission of Disease.

**Program Implementation Manual**

1. PIM #95-03 Nature and Frequency of Services (e.g., “HACCP planning and implementation”)

**Public Health Rationale:** Every food preparation process creates both opportunities for contamination and/or growth of pathogens and points at which such contamination and/or growth can be prevented. The prevention is contingent upon the foodservice operator’s awareness of the inherent risks and the implementation of planned controls to eliminate or reduce the risks.

**Background:** Hazard Analysis Critical Control Point (HACCP) is a systematic approach to food safety which can dramatically improve the level of food safety. The Food and Drug Administration (FDA), through its Model Food Code, recommends the implementation of a HACCP system throughout the food industry following the principles below:

**Principle #1 - Hazard Analysis**

The first step in the development of a HACCP plan for a food preparation process is to identify the hazards associated with the product(s).

**Principle #2 - Identify the Critical Control Points (CCP)**

A CCP is a point, step, or procedure at which control can be applied and a food safety hazard can be prevented, eliminated, or reduced to acceptable levels.

**Principle #3 - Establish Critical Limits for Preventive Measures**

Critical limits can be thought of as boundaries of safety for each CCP and may be set for preventive measures such as temperature, time, physical dimensions, water activity ( $a_w$ ), acidity (pH), and available chlorine.

**Principle #4 - Establish Procedures to Monitor CCPs**

Monitoring is a planned sequence of observations or measurements to assess whether a CCP is under control and to produce an accurate record (documentation) for use in future verification procedures.

**Principle #5 - Establish the Corrective Action to be Taken When Monitoring Shows that a Critical Limit Has Been Exceeded**

Specific corrective action plans must be developed for each CCP, demonstrate that the CCP has been brought under control, and be documented in the HACCP plan.

**Principle #6 - Establish Effective Record Keeping Systems that Document the**

**HACCP System**

A written HACCP plan should be developed for each individual product (or product category) which clearly identifies the CCPs, critical limits, and monitoring and record-keeping procedures.

**Principle #7 - Establish Procedures to Verify that the HACCP System is Working**

Verification of effective implementation of a HACCP plan may include review of critical limits to assure adequate control, review of establishment CCP records (monitoring), and periodic revalidations of the HACCP plan.

The statistics from foodborne illness surveillance reveal that retail level food establishments can have a significant impact on the health of consumers. Implementation of HACCP programs by the establishments will profoundly enhance their role in the protection of public health beyond the traditional emphasis on facility and equipment design and maintenance, and adherence to the principles of sanitation, good manufacturing, and food preparation practices. The education and training of all personnel are critical to the success and effectiveness of any HACCP program.

## **Procedures:**

### **A - Selection of establishments**

The implementation of a HACCP program in a facility requires an investment of time by environmental health management and staff in teaching, training, and follow-up. Staff should focus on establishments whose processes pose the greatest risk of foodborne illness. Selection of such establishments should include consideration of risk, menu, and processes. High and Moderate risk category establishments, preparation of potentially hazardous foods, and advanced preparation involving cooling would merit consideration. Other considerations are the willingness and ability of management to implement such a program. **Establishments which are candidates for enforcement action to achieve basic sanitation compliance are not appropriate candidates for a HACCP program.**

### **B - Marketing of HACCP**

Following selection of an establishment as a candidate for a HACCP program the Environmental Health Specialist Senior (EHS Sr.) should assess the “willingness and ability” of management to participate in this program. Conversations with management should emphasize the voluntary compliance nature of the program, the potential for reducing risks and maximizing control of processes, and the potential congruence with a chain’s existing quality assurance standards and procedures. It is important for all involved to understand that decisions to, or not to, participate and subsequent performance of HACCP monitoring are voluntary and **will not be a basis for enforcement actions.**

### **C - Development of HACCP plan**

I.) Selection of menu item - Consider selection of menu items which are potentially hazardous foods, are prepared regularly, and pose the greater degree of epidemiological risk (e.g., more complex processes involving cooling and

reheating). When working with an operator who is not familiar with HACCP, it may be wise to start small and then build upon successes.

II.) Flow chart - In consultation with the manager or chef develop a "Process Monitoring Plan" (see Attachment 1 and 2) for the selected menu item. Guidance on the development of the plan, identification of critical control points, and monitoring is contained in Attachment 5.

III.) Identify Critical Control Points (CCP's) - The key to the potential effectiveness of a HACCP plan is the accurate identification of the CCP. The CCP is an operation, preparation step, or procedure where a control measure can be expected to prevent a hazardous condition (e.g., reduce pathogenic organisms to a safe level, preclude their growth, or prevent contamination). A CCP must be observable and measurable and the plan should define standards (e.g., cooking temperature, cooling time, method of handling) for each CCP.

IV.) Monitoring point - The plan should identify a monitoring point where the CCP standard will be observed and recorded on a log each time the subject item is prepared. If more than one CCP is identified in a single plan, select the CCP which addresses the highest risk (e.g., cooling of a large volume) as a monitoring point. The consistent observation and documentation of CCP standards in a monitoring log is itself the "critical" element of a HACCP program. These logs should be retained for review by the EHS Sr. at subsequent visits.

V.) Agreement to implement/monitor - Following development and review of the "HACCP Monitoring Plan," it is necessary for the establishment manager to formally commit to "follow and monitor the critical control points and to take appropriate corrective action when needed" by signing the agreement at the end of the "Plan" (see Attachment 2). After the "Plan" has been signed by both establishment manager and EHS Sr., leave the original with the establishment manager and place a copy in the establishment file. Provision of sample logs for use in recording results will help to promote monitoring.

VI.) The responsibility to train the restaurant staff rests primarily with the operator. However, the environmental health staff should provide assistance whenever possible and resources allow.

#### **D - Verification of HACCP controls**

The EHS Sr. will evaluate and verify implementation of the HACCP plan by subsequent visits to the establishment. An early return (within two weeks) following initial development and agreement on a plan is recommended to promote monitoring. The procedures for recording such evaluations on the

“HACCP Monitoring Report” and “HACCP Monitoring Worksheet” (see Attachments 3 and 4) are included in Attachment 5. Subsequent visits should be based on the operator’s effectiveness in implementing his HACCP control plan. Where the operator is successful with his control plan, additional menu items should be added.

It is important to note that the HACCP program is not a basis for enforcement action due to its voluntary nature. An establishment which fails to implement a HACCP agreement should be removed from HACCP and returned to a system of standard enforcement inspections (see PIMs #95-03 and #96-02).

**E - Enforcement - Professional Judgement**

If, in the professional judgement of the EHS Sr., the foodservice operation presents hazards (substantial, imminent, continuing) which merit enforcement, the reliance upon the HACCP system should be discontinued and appropriate standard enforcement inspections or action initiated.

**Responsibility:** The district Environmental Health Manager is responsible for the implementation

of these procedures by the district foodservice protection program and for assuring that all staff involved in the development and implementation of HACCP systems have been thoroughly trained in HACCP principles.

The local Environmental Health Specialist Senior is responsible for the marketing, development, and verification of HACCP systems for selected foodservice operations. The local Environmental Health Specialist Senior may consult with district (or area) standardization officers, or other staff who have completed the HACCP training module, for advice on selection of appropriate establishments or menu items.

**Effective Date:** April 1, 1997

**Approved by:**

Director  
Division of Food and Environmental Services

**Endorsed by:**

Director  
Office of Environmental Health Services

PIM #97-01  
Page 7

Attachment 3: EHS-155 HACCP Monitoring Report

Attachment 4: EHS-155a HACCP Monitoring Worksheet

Attachment 5: “HACCP Forms, Worksheet, and Report”

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